

# READY READER

Kansas CMS Emergency Preparedness CoP Newsletter

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## Home Health Agency: Emergency Plan

The Home Health Agency (HHA) must develop and maintain an emergency preparedness plan that must be reviewed and updated at least annually. The plan must do all of the following:

1. Be based on and include a documented, facility-based and community-based risk assessment, utilizing an all-hazards approach.
2. Include strategies for addressing emergency events identified by the risk assessment.
3. Address patient population, including, but not limited to, the type of services the HHA has the ability to provide in an emergency; and continuity of operations, including delegations of authority and succession plans.
4. Include a process for cooperation and collaboration with local, tribal, regional, State, and Federal emergency preparedness officials' efforts to maintain an integrated response during a disaster or emergency situation, including documentation of the HHA's efforts to contact such officials and, when applicable, of its participation in collaborative and cooperative planning efforts.

*"This final rule issues emergency preparedness requirements that establish a comprehensive, consistent, flexible, and dynamic regulatory approach to emergency preparedness and response that incorporates lessons learned..."*

- Federal Register, 9/16/2016

## HHA: Policies and Procedures

The HHA must develop and implement emergency preparedness policies and procedures, based on the emergency plan set forth above, risk assessment, and the communication plan. The policies and procedures must be reviewed and updated at least annually. At a minimum, the policies and procedures must address the following:

1. The plans for the HHA's patients during a natural or man-made disaster. Individual plans for each patient must be included as part of the comprehensive patient assessment, which must be conducted according to the provisions of section 484.55.
2. The procedures to inform State and local emergency preparedness officials about HHA patients in need of evacuation from their residences at any time due to an emergency situation based on the patient's medical and psychiatric condition and home environment.

(Continued on page 2)

### In This Issue

The Home Health  
Agency Special Edition

Previous issues of the  
Ready Reader available  
at [http://  
www.kdheks.gov/cphp/  
providers.htm](http://www.kdheks.gov/cphp/providers.htm)

## HHA: Policies and Procedures cont.

3. The procedures to follow up with on-duty staff and patients to determine services that are needed, in the event that there is an interruption in services during or due to an emergency. The HHA must inform State and local officials of any on-duty staff or patients that they are unable to contact.
4. A system of medical documentation that preserves patient information, protects confidentiality of patient information, and secures and maintains the availability of records
5. The use of volunteers in an emergency or other emergency staffing strategies, including the process and role for integration of State or Federally designated health care professionals to address surge needs during and emergency.

## HHA: Communication Plan

The HHA must develop and maintain an emergency preparedness communication plan that complies with Federal, State, and local laws and must be reviewed and updated at least annually. The communication plan must include all of the following:

1. Names and contact information for the following:
  - Staff
  - Entities providing services under arrangement
  - Patients' physicians
  - Volunteers
2. Contact information for the following:
  - Federal, State, tribal, regional or local emergency preparedness staff
  - Other sources of assistance
3. Primary and alternate means for communicating with the HHA's staff, Federal, State, tribal, regional, and local emergency management agencies.
4. A method for sharing information and medical documentation for patients under the HHA's care, as necessary, with other health care providers to maintain the continuity of care.
5. A means of providing information about the general condition and location of patients under the facility's care as permitted under 45 CFR 164.510(b)(4).
6. A means of providing information about the HHA's needs, and its ability to provide assistance, to the authority having jurisdiction or the Incident Command Center, or designee.

## HHA: Training and Testing

The HHA must develop and maintain an emergency preparedness training and testing program that is based on the emergency plan set forth earlier, risk assessment, policies and procedures, and the communication plan. The training and testing program must be evaluated and updated at least annually.

1. Training program—The HHA must do all of the following:
  - A. Initial training in emergency preparedness policies and procedures to all new and existing staff, individuals providing services under arrangement, and volunteers, consistent with their expected roles.
  - B. Provide emergency preparedness training at least annually.
  - C. Maintain documentation of the training.
  - D. Demonstrate staff knowledge of emergency procedures.
1. Testing. The HHA must conduct exercises to test the emergency plan at least annually. The HHA must do the following:
  - A. Participate in a full-scale exercise that is community-based or when a community-based exercise is not accessible, an individual, facility-based. If the HHA experiences an actual natural or manmade emergency that required activation of the emergency plan, the HHA is exempt from engaging in a community-based or individual, facility-based full-scale exercise for 1 year following the onset of the actual event
  - B. Conduct an additional exercise that may include, but is not limited to the following:
    - i. A second full-scale exercise that is community-based or individual, facility-based.
    - ii. A tabletop exercise that includes a group discussion led by a facilitator, using a narrated, clinically-relevant emergency scenario, and a set of problem statements, direct messages, or prepared questions designed to challenge an emergency plan.
    - iii. Analyze the HHA's response to and maintain documentation of all drills, tabletop exercises, and emergency events, and revise the HHA's emergency plan, as needed.

# Integrated healthcare systems

If a HHA is part of a healthcare system consisting of multiple separately certified healthcare facilities that elects to have a unified and integrated emergency preparedness program, the HHA may choose to participate in the healthcare system's coordinated emergency preparedness program. If elected, the unified and integrated emergency preparedness program must do all of the following:

- A. Demonstrate that each separately certified facility within the system actively participated in the development of the unified and integrated emergency preparedness program.
- B. Be developed and maintained in a manner that takes into account each separately certified facility's unique circumstances, patient populations, and services offered.
- C. Demonstrate that each separately certified facility is capable of actively using the unified and integrated emergency preparedness program and is in compliance with the program.
- D. Include a unified and integrated emergency plan that meets the requirements above. The unified and integrated emergency plan must also be based on and include all of the following:
  - i. A documented community-based risk assessment, utilizing an all-hazards approach.
  - ii. A documented individual facility-based risk assessment for each separately certified facility within the health system, utilizing an all-hazards approach.
- E. Include integrated policies and procedures that meet the requirements set forth above, a coordinated communication plan and training and testing programs that meet the requirements above.

## HHA Highlights

### Emergency Plan

The HHA must develop and maintain an emergency preparedness plan that must be reviewed and updated at least annually. The plan must do all of the following:

1. Be based on and include a documented, facility-based and community-based risk assessment, utilizing an all-hazards approach.
2. Include strategies for addressing emergency events identified by the risk assessment.
3. Address patient population, including, but not limited to, the type of services the HHA has the ability to provide in an emergency; and continuity of operations, including delegations of authority and succession plans.
4. Include a process for cooperation and collaboration with local, tribal, regional, State, and Federal emergency preparedness officials' efforts to maintain an integrated response during a disaster or emergency situation, including documentation of the HHA's efforts to contact such officials and, when applicable, of its participation in collaborative and cooperative planning efforts.

### Policies and Procedures

The HHA must develop and implement emergency preparedness policies and procedures, based on the emergency plan set forth above, risk assessment, and the communication plan. The policies and procedures must be reviewed and updated at least annually.

1. The plans for the HHA's patients during a natural or man-made disaster. Individual plans for each patient must be included as part of the comprehensive patient assessment, which must be conducted according to the provisions of section 484.55.

### Communication Plan

The HHA must develop and maintain an emergency preparedness communication plan that complies with Federal, State, and local laws and must be reviewed and updated at least annually.

### Training and Testing

The HHA must develop and maintain an emergency preparedness training and testing program that is based on the emergency plan set forth earlier, risk assessment, policies and procedures, and the communication plan. The training and testing program must be evaluated and updated at least annually. The HHA must participate in a full-scale exercise that is community-based or when a community-based exercise is not accessible, an individual, facility-based.

# Home Health Agency Resources

Here are some resources from around the internet to aid your facility in emergency planning. These are not intended to be recommendations but provided as information.

- Emergency Preparedness Packet for Home Health Agencies by the National Association for Home Care & Hospice [http://www.nahc.org/assets/1/7/ep\\_binder.pdf](http://www.nahc.org/assets/1/7/ep_binder.pdf)
- Home Health Emergency Preparedness by Michigan Department of Health and Human Services [http://www.michigan.gov/documents/mdch/FINALHOME\\_HEALTH\\_EMERGENCY\\_PREPAREDNESS\\_PL\\_2FINAL\\_484105\\_7.pdf](http://www.michigan.gov/documents/mdch/FINALHOME_HEALTH_EMERGENCY_PREPAREDNESS_PL_2FINAL_484105_7.pdf)
- Emergency Preparedness Manual for Home Care Providers by Maryland-National Capital Homecare Association <http://www.mncha.org/resources/Documents/2015-1116%20MNHCA%20Emergency%20Preparedness%20Guide.pdf>
- Long-Term, Home Health, and Hospice Care Planning Guide for Public Health Emergencies by the Centers for Disease Control and Prevention <https://www.cdc.gov/phpr/healthcare/documents/ltc-planning-guide.docx>

## 17 Provider Types

- Hospitals
- Religious Nonmedical Health Care Institutions
- Ambulatory Surgical Centers
- Hospices
- Psychiatric Residential Treatment Facilities
- Programs of All-Inclusive Care for the Elderly
- Transplant Centers
- Long-Term Care Facilities
- Intermediate Care Facilities for Individuals with Intellectual Disabilities
- Home Health Agencies
- Comprehensive Outpatient Rehabilitation Facilities
- Critical Access Hospitals
- Clinics, Rehabilitation Agencies, and Public Health Agencies as Providers of Outpatient Physical Therapy and Speech-Language Pathology Services
- Community Mental Health Centers
- Organ Procurement Organizations
- Rural Health Clinics and Federally Qualified Health Centers
- End-State Renal Disease Facilities

## Contact Us

KDHE Health Facilities  
P—785.296.0131  
[Jim.Perkins@ks.gov](mailto:Jim.Perkins@ks.gov)

KDHE Preparedness  
P-785.296.7100  
[KDHE.Preparedness@ks.gov](mailto:KDHE.Preparedness@ks.gov)

Kansas Division of  
Emergency Management  
[Bryan.D.Murdie.nfq@mail.mil](mailto:Bryan.D.Murdie.nfq@mail.mil)

Kansas Department on  
Aging and Disability  
Services  
[Denise.German@ks.gov](mailto:Denise.German@ks.gov)

Office of the State Fire  
Marshal  
[Brenda.McNorton@ks.gov](mailto:Brenda.McNorton@ks.gov)

Kansas Hospital  
Association  
P— 785.276.3125  
[rmarshall@kha-net.org](mailto:rmarshall@kha-net.org)

Kansas Home Care  
Association  
P— 785.478.3640  
[khca@kshomecare.org](mailto:khca@kshomecare.org)

Centers for Medicare &  
Medicaid Services  
[victoria.vachon@cms.hhs.gov](mailto:victoria.vachon@cms.hhs.gov)

State ADA Coordinator  
P— 785.296.1389  
[Anthony.Fadale@ks.gov](mailto:Anthony.Fadale@ks.gov)

Kansas Health Care  
Association  
P— 785.267.6003  
[khca@khca.org](mailto:khca@khca.org)